
EXHIBIT A

EXHIBIT A

SUMM

Leon Greenberg, NSB 8094
A Professional Corporation
633 S, 4th St., suite 4
Las Vegas, NV 89101
702-383-6085
Attorney for Plaintiffs

**DISTRICT COURT
CLARK COUNTY, NEVADA**

DEBRA PITTMAN, ROSALYNE R.
SMITH, MARKOS MENDOZA, RINEO
VLIJTER and EDITH MARSHALL,
individually and on behalf of
all others similarly situated

Plaintiff(s),

-vs-

WESTGATE PLANET HOLLYWOOD LAS
VEGAS, LLC., WESTGATE RESORTS
INC., WESTGATE RESORTS LTD.,
CFI SALES & MARKETING, LTD.,
CFI SALES & MARKETING, LLC.,
CFI SALES & MARKETING, INC.,
DAVID A. SIEGEL, RICHARD SIEGEL
and "John Doe" entities 1 to
25, name and number unknown,

Defendants

CASE NO. A 587995
DEPT. NO.

XVI

SUMMONS - CIVIL

**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU
WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS.
READ THE INFORMATION BELOW.**

TO THE DEFENDANT(S): A civil Complaint has been filed by the Plaintiff(s) against
you for the relief set forth in the Complaint.

1. If you intend to defend this lawsuit, within 20 days after this Summons
is served on you, exclusive of the day of service, you must do the
following:

SUMM CIVIL/4/16/2009

(a) File with the Clerk of this Court, whose address is shown below, a formal written response to the Complaint in accordance with the rules of the Court, with the appropriate filing fee.

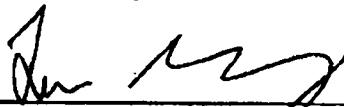
(b) Serve a copy of your response upon the attorney whose name and address is shown below.

2. Unless you respond, your default will be entered upon application of the Plaintiff(s) and failure to so respond will result in a judgment of default against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint.

3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

4. The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members and legislators each have 45 days after service of this Summons within which to file an Answer or other responsive pleading to the Complaint.

Submitted by:



LEON GREENBERG, ESQ.
633 S. 4th Street, Suite 4
Las Vegas, NV 89101
702-383-6085
Attorney for Plaintiffs

CLERK OF THE COURT

LAURA REVELES

By: _____ Date _____
Deputy Clerk

Regional Justice Center
200 Lewis Avenue
Las Vegas, NV 89155



APR 16 2009

NOTE: When service is by publication, add a brief statement of the object of the action. See Nevada Rules of Civil Procedure 4(b)

AFFIDAVIT OF SERVICE

STATE OF NEVADA)

COUNTY OF CLARK)

ss:

_____, being duly sworn, says: That at all times herein affiant was and is over 18 years of age, not a party to nor interested in the proceeding in which this affidavit is made. That affiant received _____ copy(ies) of the Summons and Complaint, _____ on the _____ day of _____, 20____ and served the same on the _____ day of _____, 20____ by:

(Affiant must complete the appropriate paragraph)

1. Delivering and leaving a copy with the Defendant _____ at (state address) _____

2. Serving the Defendant _____ by personally delivering and leaving a copy with _____, a person of suitable age and discretion residing at the Defendant's usual place of abode located at (state address) _____

[Use paragraph 3 for service upon agent, completing (a) or (b)]

3. Serving the Defendant _____ by personally delivering and leaving a copy at (state address) _____

(a) With _____ as _____, an agent lawfully designated by statute to accept service of process;

(b) With _____, pursuant to NRS 14.020 as a person of suitable age and discretion at the above address, which address is the address of the resident agent as shown on the current certificate of designation filed with the Secretary of State.

4. Personally depositing a copy in a mail box of the United States Post Office, enclosed in a sealed envelope, postage prepaid (Check appropriate method):

- ☐ Ordinary mail
☐ Certified mail, return receipt requested
☐ Registered mail, return receipt requested

1 addressed to the Defendant _____ at Defendant's last known address which
2 is

3 (state address) _____
4

5 I declare under penalty of perjury under the law of the State of Nevada that the
6 foregoing is true and correct.

7 EXECUTED this _____ day of _____, 20_____.
8

9
10 _____
11 Signature of person making service
12
13
14
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17
18
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28

1 **COMP**

2 Mark R. Thierman, NSB 8285
3 THIERMAN LAW FIRM
4 7287 Lakeside Drive
5 Reno, NV 89511
6 Telephone (775) 284-1500

7 Leon Greenberg, NSB 8094
8 A Professional Corporation
9 633 South 4th Street - Suite 4
10 Las Vegas, Nevada 89101
11 Telephone (702) 383-6085

12 Attorneys for Plaintiffs

13 **DISTRICT COURT**

14 **CLARK COUNTY, NEVADA**

A587995

15 DEBRA PITTMAN, ROSALYNE R.)
16 SMITH, MARKOS MENDOZA, RINEO)
17 VLIJTER and EDITH MARSHALL,)
18 individually and on behalf of)
19 all others similarly situated,)

20 Plaintiffs,)

21 v.)

22 WESTGATE PLANET HOLLYWOOD LAS)
23 VEGAS, LLC., WESTGATE RESORTS)
24 INC., WESTGATE RESORTS LTD.,)
25 CFI SALES & MARKETING, LTD.,)
26 CFI SALES & MARKETING, LLC.,)
27 CFI SALES & MARKETING, INC.,)
28 DAVID A. SIEGEL, RICHARD)
SIEGEL and "John Doe" entities)
1 to 25, name and number)
unknown,)

Defendants.

Case No.:

Dept. No.: *XVI*

**ARBITRATION EXEMPTION
CLAIMED BECAUSE THIS
IS A CLASS ACTION
CASE**

**CLASS ACTION COMPLAINT FOR VIOLATION
OF STATE AND FEDERAL LABOR LAWS**

Now comes Plaintiffs, for themselves and all others similarly
situated, and allege the following upon personal knowledge as to
themselves and their own acts, and upon information and belief as
to all other matters:

JURISDICTION AND VENUE

1
2 1. This Court has jurisdiction pursuant to Section 16(b) of
3 the Fair Labor Standards Act, 29 U.S.C. §216(b), which provides,
4 "An action to recover the liability prescribed in either of the
5 preceding sentences may be maintained against any employer...in any
6 federal or state court of competent jurisdiction by any one or
7 more employees for and in behalf of himself or themselves and
8 other employees similarly situated." Consent to Joinder forms
9 have been filed with this Complaint.

10 2. Venue is proper in the District Court of Nevada, Eighth
11 Judicial District, because Defendants conduct business in Clark
12 County Nevada, plaintiffs reside in Clark County, Nevada,
13 Plaintiffs worked for defendants in Las Vegas, and the acts
14 complained of herein happened in or around Las Vegas.

BACKGROUND AND PARTIES

15
16 3. Plaintiffs DEBRA PITTMAN, ROSALYNE R. SMITH, MARKOS
17 MENDOZA, RINEO VLIJTER and EDITH MARSHALL, (the "individual
18 plaintiffs"), on behalf of themselves and all others similarly
19 situated (collectively "Plaintiffs"), by their undersigned
20 attorneys, bring this action against defendants WESTGATE PLANET
21 HOLLYWOOD LAS VEGAS, LLC., WESTGATE RESORTS INC., WESTGATE RESORTS
22 LTD., CFI SALES & MARKETING, LTD., CFI SALES & MARKETING, LLC., CFI
23 SALES & MARKETING, INC., DAVID A. SIEGEL, RICHARD SIEGEL and "John
24 Doe" entities 1 to 25, name and number unknown ("Westgate" or
25 "defendants").

26 4. The defendants "John Doe" entities 1 to 25 are named
27 fictitiously and their exact legal names and the number of such
28 defendants are unknown (the "John Doe Defendants"). Such

1 defendants are legal entities that are part of the Westgate
2 Timeshare Business Enterprise (the "WTBE") that is described herein
3 and are alleged to be liable to the plaintiff in the same fashion as
4 the identified defendants, and such "John Doe" defendants shall be
5 precisely identified and named in this case at a later date when
6 sufficient information as to the same becomes available to the
7 plaintiffs.

8 5. The defendants DAVID A. SIEGEL and RICHARD SIEGEL for the
9 purposes of the claims made herein under the Fair Labor Standards
10 Act, 29 U.S.C. § 201 et seq. (the "FLSA") are deemed employers under
11 the FLSA as they have acted on behalf of an employer and/or acted as
12 an employer by willfully, intentionally, knowingly or otherwise
13 promoting, allowing, directing or otherwise creating the
14 compensation policies alleged herein that violate the FLSA, such
15 individual defendants also exercising the power they had within the
16 WTBE to continue, create, or allow such policies to flourish and
17 remain in existence.

18 6. The identified defendants that are part of the WTBE and
19 are corporations or other business entities are formed pursuant to
20 the laws of the State of Nevada or another jurisdiction and are
21 currently conducting business in the State of Nevada or have within
22 the relevant time period conducted such business either directly or
23 through their affiliated agents or entities that are part of the
24 WTBE.

25 7. The WTBE consists of all of the defendants, such business
26 being engaged in the sale, creation, development and management of
27 timeshare properties throughout the United States, including in
28 Nevada, Arizona, Florida, Missouri, Mississippi, South Carolina,

1 Tennessee, Utah and Virginia.

2 8. The WTBE derives over \$100 million per year of revenue
3 from the developing, marketing, management and sales of fractional
4 interests in "time-share" condominiums and resorts.

5 9. The individual plaintiffs were employed as marketing
6 personnel in the WTBE's Las Vegas time share sales business during
7 the six years immediately preceding the filing of this lawsuit. The
8 individual plaintiffs worked in a variety of positions, including
9 OPC, Greeter, and Marketing Manager, Marketing Supervisor, Assistant
10 Marketing Director, General Manager. WTBE either paid or promised
11 to pay the individual plaintiffs either the greater of an hourly
12 wage or commissions earned each week or a salary plus commissions.

13 10. Upon information and belief, the WTBE employed hundreds or
14 thousands of such marketing personnel within the United States on a
15 commission only basis within the last three years.

16 11. The individual plaintiffs seek certification of this case
17 as a collective action of all similarly situated marketing personnel
18 who worked for the WTBE within the last three (3) years immediately
19 preceding the filing of the Complaint and who, as alleged herein,
20 have claims under the FLSA, pursuant to 29 U.S.C. §216(b).

21 **FACTUAL ALLEGATIONS**

22 12. The WTBE employs marketing personnel like the individual
23 plaintiffs who work on defendants premises, meaning locations rented
24 by the defendants that are within other large privately owned places
25 of public accommodation, including the Planet Hollywood Casino and
26 Showcase Mall in Las Vegas, Nevada.

27 13. The marketing personnel employed by the defendant in the
28 positions of OPC and Greeter are promised that they will receive,

1 for each week of their work, the greater of an hourly rate of pay or
2 the commissions or piecework payments that they earn.

3 14. The plaintiffs who worked as OPC or Greeter also were
4 promised a set amount of commission or a piecework payment for every
5 individual they successfully convinced to participate in a timeshare
6 sales presentation by the defendants' sales personnel and during
7 certain periods of time were also promised an additional commission
8 or piecework payment based upon the volume of persons they convinced
9 to participate in a timeshare sales presentation that actually
10 bought timeshares from defendants.

11 15. The plaintiffs who worked as Marketing Manager, Marketing
12 Supervisor, Assistant Marketing Director, or General Manager were
13 paid a salary and also were promised certain commission or piecework
14 payments based upon how many persons the OPC and Greeters convinced
15 to participate in a timeshare sales presentation given by the
16 defendants' sales personnel and during certain periods of time were
17 also promised an additional commission or piecework payment based
18 upon the volume of persons they convinced to participate in a
19 timeshare sales presentation that actually bought timeshares from
20 defendants.

21 16. One or both of the defendants David A. Siegel and Richard
22 Siegel are the owners in whole or in part of the WTBE and are
23 responsible for making decisions, or ratifying the decisions of
24 other policy makers, as to the compensation policies used by the
25 WTBE for the plaintiffs.

26 17. The various nominally separate legal entities making up
27 the WTBE are, for the purposes of the Fair Labor Standards Act and
28 the other claims made herein, a common or joint enterprise or

1 partnership that is collectively, jointly and severally liable to
2 all of the putative plaintiffs described herein.

3 18. None of the defendants' marketing persons working in the
4 position of OPC or Greeter receive any extra overtime pay for work
5 in excess of forty (40) hours per week and they regularly do perform
6 such work, such persons only receive payment of the commissions or
7 piecework payments they earn in such weeks.

8 19. WTBE, which is in the business of selling real estate, is
9 not engaged in an industry having a "retail concept" as that term
10 is defined by the United States Department of Labor at Subpart D of
11 Part 779 of Title 29 of the Code of Federal Regulations.

12 20. None of the defendants' marketing persons working in the
13 position of OPC or Greeter are engaged in "sales" activities in
14 that such persons do not sell a retail or other product or service
15 and, in fact, sell nothing whatsoever, as their function is to
16 persuade people to participate in timeshare sales presentations.

17 **CLASS AND COLLECTIVE ACTION ALLEGATIONS**

18 21. Pursuant to Section 16(b) of the FLSA, the individual
19 plaintiffs bring this Complaint as a collective action (also
20 commonly referred to as an "opt-in" class), on behalf of themselves
21 and all persons similarly situated within the class of marketing
22 persons employed by the WTBE in OPC or Greeter positions in the
23 State of Nevada within three (3) years of the filing of this
24 Complaint until entry of judgment after trial.

25 22. In respect to the Nevada statutory claims set forth in the
26 Second and Third Claims for relief, and the breach of contract and
27 conversion claims set forth in the Fourth Claim for relief, the
28 individual plaintiffs bring this action as a class action pursuant

1 to N.R.C.P Rule 23 on behalf of themselves and a subclasses of all
2 similarly situated marketing persons employed by the WTBE in the
3 State of Nevada in the OPC and Greeter position in respect to the
4 Second Claim for relief, and as a class of all similarly situated
5 marketing persons employed by the WTBE in the State of Nevada on the
6 Third and Fourth Claims for Relief who sustained damages from
7 defendants' breach of its contracts with its marketing personnel
8 within six (6) years or such other applicable statute of limitations
9 of the filing of this Complaint until entry of judgment after trial.
10

11 23. Plaintiffs are informed and believe, and based thereon
12 allege that there are at least 500 putative class and subclass
13 members. The actual number of class and subclass members is readily
14 ascertainable by a review of the WTBE's records through appropriate
15 discovery.

16 24. The number of class members is so numerous that joinder is
17 impracticable and would involve hundreds or thousands of actions.
18 Disposition of these claims in a class and/or collective action
19 rather than in individual actions will benefit the parties and the
20 Court.

21 25. There is a well-defined community of interest in the
22 questions of law and fact affecting the class as a whole.

23 26. Proof of a common or single set of facts will establish
24 the right of each member of the class and subclass to recover.
25 These common questions of law and fact predominate over questions
26 that affect only individual class members. The individual
27 plaintiffs' claims are typical of those of the class and the
28 subclass.

1 27. A class or collective action is superior to other
2 available methods for the fair and efficient adjudication of the
3 controversy. Due to the typicality of the class members' claims,
4 the interests of judicial economy will be best served by
5 adjudication of this lawsuit as a class action. This type of case
6 is uniquely well-suited for class or collective treatment since 1)
7 the employer's practices were uniform; 2) the burden is on the
8 employer to prove any exemption; 3) the employer must demonstrate it
9 has compensated the class members in compliance with their contracts
10 of employment; and 4) the burden is on the employer to disprove the
11 hours of overtime claimed by the employees.

12 28. The individual plaintiffs will fairly and adequately
13 represent the interests of the class and the subclass, and have no
14 interests that conflict with or are antagonistic to the interests of
15 the class or the subclass.

16 29. The individual plaintiffs and counsel are aware of their
17 fiduciary responsibilities to the class members and are determined
18 to diligently discharge those duties by vigorously seeking the
19 maximum possible recovery for the class.

20 30. There is no plain, speedy, or adequate remedy other than
21 by maintenance of this class action. The prosecution of individual
22 remedies by members of the class will tend to establish inconsistent
23 standards of conduct for the defendants and result in the impairment
24 of class members' rights and the disposition of their interests
25 through actions to which they were not parties.

26 **FIRST CLAIM FOR RELIEF UNDER THE FAIR LABOR STANDARDS ACT**

27 31. The individual plaintiffs repeat the allegations set forth
28 in paragraphs 1 through 30 as if each were separately and completely

1 set forth herein.

2 32. The defendant, the WTBE is in the business of developing
3 and marketing time-share condominiums and resorts. The WTBE
4 includes real estate companies required to be licensed by the Real
5 Estate licensing authorities in the states in which it does
6 business.

7 33. The business of marketing time-share condominiums and
8 resorts is not a retail business as that term is defined by the
9 United States Department of Labor at Subpart D of Part 779 of Title
10 29 of the Code of Federal Regulations and the activities of the
11 plaintiffs in the position of OPC or Greeter in furtherance of that
12 business are not subject to any exemption from the FLSA's
13 requirements in respect to the payment of overtime or minimum
14 wages.

15 34. By their conduct, as set forth herein, defendants violated
16 29 U.S.C. §207(a) by failing to pay the FLSA Class time and one-half
17 their regular hourly rates for hours worked in excess of forty (40)
18 hours during a workweek and at certain times violated 29 U.S.C. §
19 206 by failing to pay a minimum wage to employees during certain
20 weeks of employment.

21 35. As a result of the unlawful acts of defendants, the
22 individual plaintiffs and the plaintiff class members have been
23 deprived of overtime pay and/or minimum wages in amounts to be
24 proven at trial.

25 36. At all relevant times, the WTBE was aware of the duties
26 performed by the individual plaintiffs and the FLSA Class and was
27 also fully aware that the duties of the individual plaintiffs and
28 the FLSA Class Members were inconsistent with exempt status, and

1 that such persons were and are not exempt from the overtime and
2 minimum wage provisions of the FLSA.

3 37. Defendants' violations of 29 U.S.C. §207(a) and 29 U.S.C.
4 § 206 were repeated, willful and intentional.

5 38. The individual plaintiffs, on behalf of themselves and all
6 of the FLSA class members who choose to join this action by filing
7 written consents to joinder with the Court, demand judgment against
8 defendants for the unpaid balance of overtime compensation and/or
9 minimum wages, plus an equal amount as liquidated damages, along
10 with reasonable attorneys' fees and costs of suit, and such other
11 relief as the court deems proper and just.

12 **SECOND CLAIM FOR RELIEF UNDER NEVADA'S LABOR LAWS**

13 39. The individual plaintiffs repeat the allegations set forth
14 in paragraphs 1 through 38 as if each were separately and completely
15 set forth herein.

16 40. The individual plaintiffs bring this Second Claim for
17 Relief against the defendants pursuant to NRS § 608.250, for non-
18 payment of minimum wages, NRS § 608.018, for non-payment of overtime
19 wages and NRS § 608.019, for payment of unpaid rest periods, on
20 behalf of themselves and the subclass of Nevada OPC and Greeter
21 marketing employees.

22 41. Pursuant to NRS § 608.250, the plaintiffs were entitled to
23 an hourly minimum wage, and pursuant to NRS § 608.018, they were
24 also entitled to the payment of wages at time and one-half their
25 normal hourly rate when they worked in excess of 8 hours a day or 40
26 hours a week, and the plaintiffs were not paid such required wages.

27 42. Pursuant to NRS § 608.019, the plaintiffs were entitled
28 to paid rest time equal to 10 minutes for every 4 hours of work or

1 major fraction thereof each day and the defendant failed to provide
2 the paid rest time required by such statute.

3 43. The individual plaintiffs on behalf of themselves and
4 the subclass members, seek, on this Second Claim for Relief, a
5 judgment against defendants for minimum wages and/or overtime wages
6 and unpaid rest time, such sums to be determined based upon an
7 accounting of the hours worked by, and wages actually paid to, the
8 plaintiffs, and also seek an award of attorney's fees, interest and
9 costs, as provided for by Nevada Law.

10 **THIRD CLAIM FOR RELIEF UNDER N.R.S. § 608.040**

11 44. The individual plaintiffs repeat the allegations set forth
12 in paragraphs 1 through 43 as if each were separately and completely
13 set forth herein.

14 45. The individual plaintiffs bring this Third Claim for
15 Relief pursuant to Nevada Revised Statutes § 608.040.

16 46. The individual plaintiffs, and numerous members of the
17 plaintiff class, prior to the initiation of this litigation, were
18 discharged or resigned from their employment with the defendants and
19 at the time of such discharge or resignation were owed unpaid wages
20 by the defendant.

21 47. The defendants have failed and refused to pay such
22 individual plaintiffs and numerous members of the plaintiff class
23 their earned but unpaid wages, such conduct by the defendants
24 constituting a violation of N.R.S. § 608.020, or § 608.030 and
25 giving rise to a claim under N.R.S. § 608.040.

26 48. As a result of the foregoing, the individual plaintiff
27 seek on behalf of himself and numerous similarly situated members of
28 the plaintiff class, a judgment against the defendants for the

1 penalty prescribed by Nevada Revised Statutes § 608.040, to wit, for
2 a sum equal to up to thirty days wages, along with interest, costs
3 and attorneys' fees.

4 **FOURTH CLAIM FOR RELIEF FOR BREACH OF CONTRACT**

5 49. The individual plaintiffs repeat the allegations set forth
6 in paragraphs 1 through 48 as if each were separately and completely
7 set forth herein.

8 50. That pursuant to a written contract or series of written
9 contracts, the defendants promised to pay the individual plaintiffs
10 and the members of the plaintiff class certain commissions or
11 piecework payments in exchange for their work as marketing persons
12 for the defendants.

13 51. The defendants breached the aforesaid contracts in that
14 pursuant to such contracts, the individual plaintiffs and the
15 members of the plaintiff class should have received certain
16 commissions or piecework payments which the defendants failed to pay
17 the individual plaintiffs and the members of the plaintiff class.

18 52. Upon information and belief, the aforesaid contracts were
19 uniform and all of the proposed class members were promised such
20 commissions or piecework payments, albeit on occasion in differing
21 amounts.

22 53. On this Fourth Cause of action for breach of contract, the
23 individual plaintiffs seek class certification on behalf of all
24 similarly situated marketing personnel of the defendant in the State
25 of Nevada.

26 54. As a result of the foregoing, the individual plaintiffs
27 seek on behalf of themselves and numerous similarly situated members
28 of the alleged class of defendants' marketing personnel in the State

1 of Nevada, a judgment against the defendants for the sums of money
2 owed to such persons as a result of the defendants' breach of its
3 written contracts to pay such persons commissions or piecework
4 payments, along with interest, costs and attorneys' fees.

5 **PRAYER FOR RELIEF**

6 WHEREFORE, the individual plaintiffs and the plaintiff class
7 members demand judgment against defendants as hereinafter set forth,
8 including, *inter alia*:

- 9 (a) Declare this action to be maintainable as a collective
10 action pursuant to 29 U.S.C. §216(b), and direct
11 defendants to provide a list of all persons employed by it
12 as OPC or Greeter marketing persons in the State of Nevada
13 during the past three (3) years, including the last known
14 address and telephone number of each person, so that the
15 individual plaintiffs can give such persons notice of this
16 action and an opportunity to make an informed decision
17 about whether to participate or not;
18
- 19 (b) Determine the damages sustained by the individual
20 plaintiffs and the plaintiff class members as a result of
21 defendants' violations of 29 U.S.C. § 206 and § 207, and
22 award those damages against defendants and in favor of the
23 individual plaintiffs and all members of the FLSA Class,
24 plus an additional equal amount as liquidated damages
25 under 29 U.S.C. §216(b), and such pre-judgment interest as
26 may be allowed by law;
- 27 (c) Certify the individual plaintiffs' claims under Nevada's
28 statutes and for breach of contract pursuant to N.R.C.P.

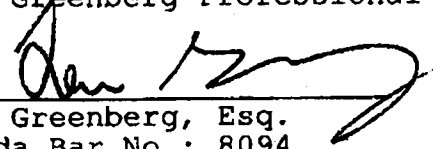
1 § 23 as a class action and award an appropriate judgment
2 against the defendants for damages to the individual
3 plaintiffs and class members who sustained damages from
4 the defendants' breach of their contracts and violations
5 of Nevada's statutes;

6 (d) Award Plaintiffs their costs and disbursements of this
7 suit, including without limitation, reasonable attorneys',
8 accountants' and experts' fees;

9 (e) Grant Plaintiff and the Plaintiff class members such other
10 and further relief as the Court may deem just and proper.

11
12 Plaintiff further demands a trial by jury on all issues so
13 triable.

14 Submitted by the attorneys for the
15 Plaintiffs and the Class,
16 Leon Greenberg Professional Corporation

17 By: 
18 Leon Greenberg, Esq.
19 Nevada Bar No.: 8094
20 633 South 4th Street - Suite 4
21 Las Vegas, Nevada 89101
22 (702) 383-6085
23 Attorney for Plaintiffs
24
25
26
27
28

1 CONS

2 Mark R. Thierman, NSB 8285
 3 THIERMAN LAW FIRM
 4 7287 Lakeside Drive
 Reno, NV 89511
 Telephone (775) 284-1500

5 Leon Greenberg, NSB 8094
 A Professional Corporation
 6 633 South 4th Street - Suite 4
 Las Vegas, Nevada 89101
 7 Telephone (702) 383-6085
 Attorneys for Plaintiffs

FILED

APR 17 11 59 AM '09

Earl Thierman
 CLERK OF THE COURT

9 **DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11

12 -----X
 13 DEBRA PITTMAN, ROSALYNE R.)
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 14 VLIJTER and EDITH MARSHALL,)
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 20 DAVID A. SIEGEL, RICHARD SIEGEL)
 and "John Doe" entities 1 to)
 21 25, name and number unknown,)
 Defendants.)

Docket # A 587995

DEPT NO. XVI

NOTICE OF FILING OF
 CONSENTS TO JOINDER UNDER
 29 U.S.C. § 216(b)

23

24 -----X

25 S I R S:

26 PLEASE TAKE NOTICE that annexed hereto are Consents to Joinder
 27 pursuant to 29 U.S.C. § 216(b) which are to be filed with the Clerk
 28 of the Court as of the date hereof on behalf of Debra Pittman,

1 Rosalyne R. Smith, Markos Mendoza, Rineo Vlijter and Edith Marshall

2 Dated: April 16, 2009

Respectfully submitted,

3 
4 /s/ LEON GREENBERG

By: _____
5 Leon Greenberg, Esq.
6 Nevada Bar No.: 8094
7 633 South 4th Street - Suite 4
8 Las Vegas, Nevada 89101
9 (702) 383-6085
10 Attorney for Plaintiffs
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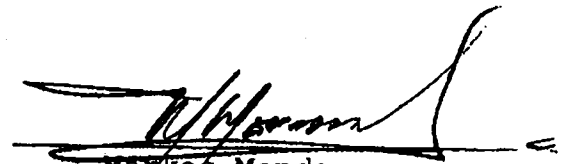
CONSENT TO JOINDER

Edith Marshall by signing
below, hereby consents to join this case as a plaintiff pursuant
to 29 U.S.C. 216(b).


Edith Marshall

CONSENT TO JOINDER

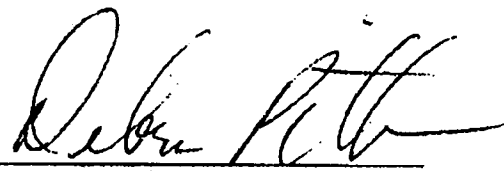
Markos Mendoza by signing
below, hereby consents to join this case as a plaintiff pursuant
to 29 U.S.C. 216(b).



Markos Mendoza

CONSENT TO JOINDER

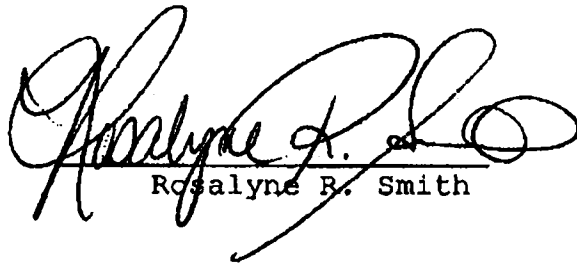
Debra Pittman by signing
below, hereby consents to join this case as a plaintiff pursuant
to 29 U.S.C. 216(b).



Debra Pittman

CONSENT TO JOINDER

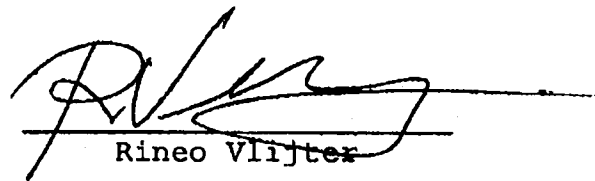
Rosalynne R. Smith by signing
below, hereby consents to join this case as a plaintiff pursuant
to 29 U.S.C. 216(b) .



Rosalynne R. Smith

CONSENT TO JOINDER

Rineo Vlijter by signing
below, hereby consents to join this case as a plaintiff pursuant
to 29 U.S.C. 216(b).



Rineo Vlijter